

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**DR. JEROME CORSI and  
LARRY KLAYMAN,**

Plaintiffs,

vs.

**INFOWARS, LLC, FREE SPEECH  
SYSTEMS, LLC, ALEX E. JONES,  
DAVID JONES, OWEN SHROYER, and  
ROGER STONE**

Defendants.

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CIVIL ACTION NO. 1:20-CV-00298-LY

**PLAINTIFFS' JOINT DESIGNATION OF WITNESSES, EXPERTS, AND EXHIBITS**

Plaintiffs Larry Klayman and Jerome Corsi ("Plaintiffs") hereby designate their potential witnesses, testifying experts, and proposed exhibits as follows:

**I. POTENTIAL WITNESSES**

1. Larry Klayman
2. Jerome Corsi
3. Roger Stone
4. Alex Jones
5. Owen Shroyer
6. David Jones
7. Thomas Fitton
8. Randy Credico
9. Victims of the Sandy Hook massacre who were defamed by Alex Jones and the Infowars Defendants

10. Mark Randazza, Esq.
11. Robert Buschel, Esq.
12. Christopher Ruddy
13. John Cardillo
14. John Bachman
15. Mark Cernovich
16. Kelly Morales
17. Cassandra Fairbanks
18. Robert Mueller
19. Andrew Weismann
20. Aaron Zalinsky
21. Jeannie Rhee
22. Hon. Amy Berman Jackson
23. Tucker Carlson
24. Chuck Ross of The Daily Caller
25. Michael Caputo
26. Margaret Kuntsler
27. Dennis Montgomery
28. Sandy Cobas
29. Dianne Thorne
30. Joel Gilbert
31. Scott Reed
32. Bob Barr

33. Alan Keyes
34. Hon. Royce Lamberth and Hon. Stanley Sporkin
35. Sheriff Joe Arpaio
36. Charles Strange
37. Joseph Farah
38. Witnesses attesting to Dr. Corsi's affected health and good will and reputation caused by Defendants
39. Persons who have heard and watched the defamatory statements, which will be uncovered as discovery progresses, notwithstanding Defendants' obstructionist tactics.
40. Any witnesses identified by any party or third party in discovery
41. Any witnesses identified in the Amended Complaint
42. All documents and witnesses put forth by Defendants in their disclosure today.

Plaintiffs reserve the right to supplement this list. Discovery is also underway which will uncover more information and documentary evidence.

## **II. TESTIFYING EXPERTS**

Plaintiffs designate no testifying experts at this time, but reserve the right to supplement this designation upon discovery.

## **III. POTENTIAL EXHIBITS**

1. The defamatory videos and documents identified and referenced in the Amended Complaint
2. Deposition transcript of Thomas Fitton
3. Infowars, LLC's corporate documents

4. Free Speech Systems, LLC's corporate documents
5. Contract between Dr. Corsi and Infowars.
6. Roger Stone's indictment, jury verdict, and judgment
7. Documents showing Infowars' commercial sales of goods, services and other commercial activities
8. Articles regarding Pizzagate, including but not limited to:  
<https://www.rollingstone.com/feature/anatomy-of-a-fake-news-scandal-125877/>
9. Articles on Roger Stone admitting to spreading lies on Infowars and settling lawsuits, including but not limited to: <https://theweek.com/speedreads/813286/roger-stone-settles-lawsuit-admits-spreading-lies-infowars>
10. Articles evidencing that Roger Stone is still working with the Infowars Defendants, including but not limited to: <https://www.infowars.com/posts/roger-stone-reveals-trumps-path-to-victory/> and that Stone has a radio show.
11. Affidavits of Larry Klayman and Jerome Corsi and Kelly Morales.
12. Book jackets for books authored by Larry Klayman including Whores: Why and How I Came to Fight the Establishment and It Takes a Revolution: Forget the Scandal Industry!
13. Deposition transcript of Roger Stone taken by Mr. Klayman (CASE NO. 19-011394)
14. New York Times Bestseller lists
15. Any documents identified by any party or third party in discovery.
16. Any documents identified in the Amended Complaint

Insert exhibits identified by the Defendants

Plaintiffs reserve the right to supplement this list. And discovery is underway despite Defendants efforts to obstruct it. Motions to compel will be soon filed, as Plaintiffs have served discovery and Defendants have brazenly stonewalled Plaintiffs' requests. In sum, Plaintiffs reserve the right to amend.

Dated: December 1, 2020

Respectfully Submitted,

/s/Sanjay Biswas

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*Plaintiff Pro Se*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1<sup>st</sup> day of December 2020, a true copy of the foregoing was filed via ECF and served to all counsel of record though the Court's ECF system.

/s/ Sanjay Biswas



